

EXHIBIT 4

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Charles K. Verhoeven (Cal. Bar No. 170151)
charlesverhoeven@quinnemanuel.com
David Perlson (Cal. Bar No. 209502)
davidperlson@quinnemanuel.com
Melissa J. Baily (Cal. Bar No. 237649)
melissabaily@quinnemanuel.com
John Neukom (Cal. Bar No. 275887)
johnneukom@quinnemanuel.com
Jordan R. Jaffe (Cal. Bar No. 254886)
jordanjaffe@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Attorneys for Plaintiff WAYMO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-JCS

**PLAINTIFF WAYMO LLC’S THIRD SET
OF REQUESTS FOR PRODUCTION TO
DEFENDANTS**

Honorable William H. Alsup

**HIGHLY CONFIDENTIAL –
ATTORNEYS’ EYES ONLY**

**PLAINTIFF’S THIRD SET OF REQUESTS FOR PRODUCTION
TO DEFENDANTS UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC; OTTO
TRUCKING LLC,**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Waymo LLC (“Waymo”) request that Defendants Uber Technologies, Inc. (“Uber”), Ottomotto, LLC (“Ottomotto”), and Otto Trucking LLC (“Otto Trucking” (collectively “Defendants”), produce for inspection and copying within thirty days (30) hereof the documents set forth below at the offices

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REQUEST FOR PRODUCTION NO. 157:

DOCUMENTS sufficient to show the reasons behind DEFENDANTS’ and/or OTTO TRUCKING’s decision not to deploy self-driving trucks in Texas.

REQUEST FOR PRODUCTION NO. 158:

DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado, Pennsylvania, Arizona, and California.

REQUEST FOR PRODUCTION NO. 159:

DOCUMENTS sufficient to show the total number of miles DEFENDANTS’ self-driving trucks have traveled each month in each state, broken out by month and by state.

REQUEST FOR PRODUCTION NO. 160:

DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado, Pennsylvania, Arizona, and California.

REQUEST FOR PRODUCTION NO. 161:

All DOCUMENTS and COMMUNICATIONS REGARDING the naming of FUJI.

REQUEST FOR PRODUCTION NO. 162:

All DOCUMENTS and COMMUNICATIONS REGARDING the naming of SPIDER.

REQUEST FOR PRODUCTION NO. 163:

All DOCUMENTS and COMMUNICATIONS REGARDING the naming of OWL.

REQUEST FOR PRODUCTION NO. 164:

All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSI.

REQUEST FOR PRODUCTION NO. 165:

All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSI.